

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Stuart J. Lieberman, Esq.

**LIEBERMAN & BLECHER, P.C.**

10 Jefferson Plaza, Suite 400

Princeton, New Jersey 08540

*Attorneys for Creditor Coventry Square  
Condominium Association*

Case No.: 17-33851

Chapter: 11

Judge: Hon. Michael B. Kaplan, U.S. B.J.

In Re:

**AVRAHAM MANHEIM and  
SYLVIA MANHEIM,**

Debtors.

**OBJECTION OF CREDITOR COVENTRY SQUARE CONDOMINIUM ASSOCIATION  
TO DEBTORS' FIRST MODIFIED PLAN OF REORGANIZATION**

Creditor Coventry Square Condominium Association (the "Association"), by and through its undersigned attorney, hereby files this objection to the first modified plan of reorganization of the Debtors Avraham Manheim and Sylvia Manheim (together, "Debtors"). The Association respectfully states the following in support of its objection:

**JURISDICTION**

1. The Court has jurisdiction to hear and determine this objection as provided by the relevant provisions of law.
2. The Association has standing to raise this objection and the issues stated herein as provided by the relevant provisions of law.

### **BACKGROUND**

3. On November 28, 2017, Debtors filed a voluntary petition for relief under Chapter 11 of title 11 of the United States Code. See Docket Entry 1.
4. On that same day, Debtors filed a First Modified Plan of Reorganization. See Docket Entry 9.
5. On December 12, 2017, Debtors filed an amended First Modified Plan of Reorganization. See Docket Entry 52.
6. Of note, and upon information and belief, Debtors have previously filed a Chapter 11 petition before this Court under case number 17-22581 on June 20, 2017. The Court dismissed that petition on November 2, 2017. Prior to that, debtor Avraham Manheim filed two Chapter 13 cases before this court, each of which the court dismissed. The current Chapter 11 case is debtor Sylvia Manheim's second bankruptcy petition and debtor Avraham Manheim's fourth petition in a single calendar year.
7. The Association filed a timely proof of claim on March 27, 2018.

### **OBJECTION**

8. The Association objects to the Debtors' plan because it does not propose to pay the Association's \$4,940.00 claim, of which at least \$3,015 is secured as a statewide docketed judgment and was recorded as such on December 2, 2016, prior to the Debtor's filing of this bankruptcy petition. See Exhibit A.
9. The Debtor's plan is not fair and equitable because it does not address the Association's claim.

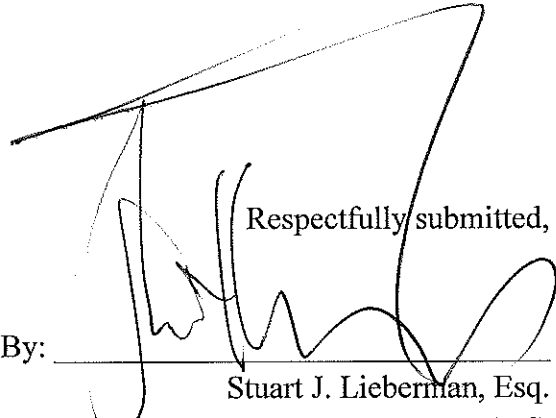
**CONCLUSION**

10. For these reasons and for any other reasons that may be demonstrated in papers submitted by the parties or at the relevant hearing, the Debtors First Modified Plan of Reorganization is not adequate, nor is it fair and equitable, and therefore, respectfully, this Court should not confirm the proposed plan.

WHEREFORE, Coventry Square Condominium Association respectfully requests that the Court deny confirmation of the Debtors' First Modified Plan of Reorganization, and that the Court grant such other relief to the Association as the Court deems just and equitable.

March 23, 2018

Respectfully submitted,

By:   
Stuart J. Lieberman, Esq.  
OF LIEBERMAN & BLECHER, P.C.

# EXHIBIT A

B10 (Official Form 10) (04/13)

<b>UNITED STATES BANKRUPTCY COURT</b>		<b>PROOF OF CLAIM</b>						
Name of Debtor: Avaraham D. Manheim, and Sylvia Manheim	Case Number: 17-33851-MBK							
NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. § 503.								
Name of Creditor (the person or other entity to whom the debtor owes money or property): Coventry Square Condominium Association								
Name and address where notices should be sent:  Stuart J. Lieberman, Esq., Lieberman & Blecher, P.C., 10 Jefferson Plaza, Suite 400, Princeton, NJ 08540  Telephone number: (732) 355-1310 email: DKN@liebermanblecher.com		<b>COURT USE ONLY</b>  <input type="checkbox"/> Check this box if this claim amends a previously filed claim.  <b>Court Claim Number:</b> _____ <i>(If known)</i>  <b>Filed on:</b> _____						
Name and address where payment should be sent (if different from above):    Telephone number: email:		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.						
<b>1. Amount of Claim as of Date Case Filed:</b> \$ <u>4,940.00</u>  If all or part of the claim is secured, complete item 4.  If all or part of the claim is entitled to priority, complete item 5.  <input checked="" type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of the claim. Attach a statement that itemizes interest or charges.								
<b>2. Basis for Claim:</b> Condominium association and maintenance fees (See instruction #2)								
<b>3. Last four digits of any number by which creditor identifies debtor:</b>  <div style="text-align: center; font-family: monospace; font-size: 1.2em;">2 1 6 4</div>	<b>3a. Debtor may have scheduled account as:</b>  _____ (See instruction #3a)	<b>3b. Uniform Claim Identifier (optional):</b>  _____ (See instruction #3b)						
<div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <b>4. Secured Claim</b> (See instruction #4)            Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.   <b>Nature of property or right of setoff:</b> <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input checked="" type="checkbox"/> Other  <b>Describe:</b> Statewide docketed judgment   <b>Value of Property:</b> \$ _____   <b>Annual Interest Rate</b> _____ % <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable            (when case was filed)         </div> <div style="width: 45%;"> <b>Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any:</b>             \$ _____   <b>Basis for perfection:</b> _____   <b>Amount of Secured Claim:</b> \$ <u>3,015.00</u>   <b>Amount Unsecured:</b> \$ <u>1,925.00</u> </div> </div>								
<b>5. Amount of Claim Entitled to Priority under 11 U.S.C. § 507 (a).</b> If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount.								
<table style="width: 100%; border: none;"> <tr> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507 (a)(1)(A) or (a)(1)(B).         </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier – 11 U.S.C. § 507 (a)(4).         </td> <td style="width: 33%; vertical-align: top;"> <input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. § 507 (a)(5).         </td> </tr> <tr> <td style="vertical-align: top;"> <input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. § 507 (a)(7).         </td> <td style="vertical-align: top;"> <input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. § 507 (a)(8).         </td> <td style="vertical-align: top;"> <input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. § 507 (a)( ).         </td> </tr> </table>			<input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507 (a)(1)(A) or (a)(1)(B).	<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier – 11 U.S.C. § 507 (a)(4).	<input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. § 507 (a)(5).	<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. § 507 (a)(7).	<input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. § 507 (a)(8).	<input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. § 507 (a)( ).
<input type="checkbox"/> Domestic support obligations under 11 U.S.C. § 507 (a)(1)(A) or (a)(1)(B).	<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier – 11 U.S.C. § 507 (a)(4).	<input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. § 507 (a)(5).						
<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. § 507 (a)(7).	<input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. § 507 (a)(8).	<input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. § 507 (a)( ).						
<div style="text-align: right;"><b>Amount entitled to priority:</b></div> <div style="text-align: right;">\$ _____</div>								
<i>*Amounts are subject to adjustment on 4/01/16 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</i>								
<b>6. Credits.</b> The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)								

B10 (Official Form 10) (04/13)

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7. Documents: Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and redacted copies of documents providing evidence of perfection of a security interest are attached. If the claim is secured by the debtor's principal residence, the Mortgage Proof of Claim Attachment is being filed with this claim. (See instruction #7, and the definition of "redacted".)

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

8. Signature: (See instruction #8)

Check the appropriate box.

☐ I am the creditor. ☐ I am the creditor's authorized agent. ☐ I am the trustee, or the debtor, or their authorized agent. ☐ I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.) (See Bankruptcy Rule 3004.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: Marcel Rottenberg  
Title: President  
Company: Coventry Square Condo Assoc.  
Address and telephone number (if different from notice address above):  
445 East Kennedy Blvd.  
Lakewood, CO 80501

(Signature)

(Date)

Telephone number: 732-367-2073 email: coventrysquarecondo@hotmail.com

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

#### INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, exceptions to these general rules may apply.

#### Items to be completed in Proof of Claim form

##### Court, Name of Debtor, and Case Number:

Fill in the federal judicial district in which the bankruptcy case was filed (for example, Central District of California), the debtor's full name, and the case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is at the top of the notice.

##### Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

##### 1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

##### 2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to the claim.

##### 3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

##### 3a. Debtor May Have Scheduled Account As:

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

##### 3b. Uniform Claim Identifier:

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

##### 4. Secured Claim:

Check whether the claim is fully or partially secured. Skip this section if the

claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

##### 5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507 (a).

If any portion of the claim falls into any category shown, check the appropriate box(es) and state the amount entitled to priority. (See Definitions.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

##### 6. Credits:

An authorized signature on this proof of claim serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

##### 7. Documents:

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement or secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. Do not send original documents, as attachments may be destroyed after scanning.

##### 8. Date and Signature:

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

**DEFINITIONS**

**Debtor**

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

**Creditor**

A creditor is a person, corporation, or other entity to whom debtor owes a debt that was incurred before the date of the bankruptcy filing. See 11 U.S.C. §101 (10).

**Claim**

A claim is the creditor's right to receive payment for a debt owed by the debtor on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

**Proof of Claim**

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

**Secured Claim Under 11 U.S.C. § 506 (a)**

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien.

A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

**Unsecured Claim**

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

**Claim Entitled to Priority Under 11 U.S.C. § 507 (a)**

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

**Redacted**

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

**Evidence of Perfection**

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

**INFORMATION**

**Acknowledgment of Filing of Claim**

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system ([www.pacer.psc.uscourts.gov](http://www.pacer.psc.uscourts.gov)) for a small fee to view your filed proof of claim.

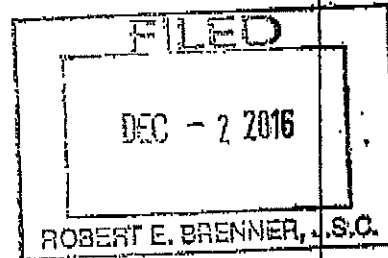
**Offers to Purchase a Claim**

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 *et seq.*), and any applicable orders of the bankruptcy court.

RECORDED AS ALIEN APR 05 2017

(43)

Stuart J. Lieberman, Esq. (ID: 016521986)  
LIEBERMAN & BLECHER, P.C.  
10 Jefferson Plaza, Suite 400  
Princeton, New Jersey 08540  
Tel.: (732) 355-1311  
Attorneys for Plaintiff



COVENTRY SQUARE CONDOMINIUM  
ASSOCIATION,

Plaintiff,

vs.

SYLVIA MANHEIM,

Defendant.

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
OCEAN COUNTY

DOCKET NO.: OCN-L-1550-16

CIVIL ACTION

ORDER OF FINAL JUDGMENT BY  
DEFAULT

**GRANTED**

THIS MATTER being opened to the Court by Lieberman & Blecher, P.C., attorneys for Plaintiff, Coventry Square Condominium Association, by way of Motion seeking an Order entering final judgment by default against Defendant, and the court having considered the Motion, pleadings on file, and/or argument of the parties and for good cause having been shown:

IT IS ON THIS 2 day of December, 2016,

ORDERED that Final Judgment by Default is hereby entered against Defendant in the sum of \$3015.00 \* in favor of Plaintiff, Coventry Square Condominium Association; and it is further

ORDERED that a copy of this Order shall be served by the moving party upon the Defendant within 7 days from receipt thereof.

regular, certified mail

☒ Opposed  
☐ Unopposed

Robert E. Brenner, J.S.C.

\* inclusive of \$762.00 in Attorneys fees

J050195-17



DATE: 3/19/18 TIME: 3:24 PM

Coventry Square Condo. Assoc.

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FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
020110		APPLY CHARGES		A1		Maintenance Fee	90.00	90.00
021210	90.00	7828	021210	A1		Maintenance Fee	(90.00)	0.00
030110		APPLY CHARGES		A1		Maintenance Fee	90.00	90.00
031110	90.00	7906	031110	A1		Maintenance Fee	(90.00)	0.00
040110		APPLY CHARGES		A1		Maintenance Fee	90.00	90.00
041410	90.00	7982	041410	A1		Maintenance Fee	(90.00)	0.00
050110		APPLY CHARGES		A1		Maintenance Fee	90.00	90.00
050310		EXPENSE ADJ		09		Lease Renewal	20.00	110.00
050310		June 1 2010						
050410		EXPENSE ADJ		A1		Maintenance Fee	(10.00)	100.00
050410		reduction in maintenance						
051110	80.00	8075	051110	A1		Maintenance Fee	(80.00)	20.00
051110	20.00	8077	051110	09		Lease Renewal	(20.00)	0.00
060110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
060810		EXPENSE ADJ		16		I.D. / Pool Car	3.00	83.00
060810		Renewal pool passes 2010						
060910	3.00	875365	060910	16		I.D. / Pool Car	(3.00)	80.00
061110	80.00	8195	061110	A1		Maintenance Fee	(80.00)	0.00
070110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
071310	80.00	8265	071310	A1		Maintenance Fee	(80.00)	0.00
080110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
081110	80.00	8369	081110	A1		Maintenance Fee	(80.00)	0.00
090110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
091510	80.00	8461	091510	A1		Maintenance Fee	(80.00)	0.00
100110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
101210	80.00	8520	101210	A1		Maintenance Fee	(80.00)	0.00
110110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
111110	80.00	8609	111110	A1		Maintenance Fee	(80.00)	0.00
120110		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00

DATE: 3/19/18 TIME: 3:24 PM

Coventry Square Condo. Assoc.

Page: 2

FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
121310	80.00	8732	121310	A1		Maintenance Fee	(80.00)	0.00
010111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
011411	80.00	8802	011411	A1		Maintenance Fee	(80.00)	0.00
011811	80.00	ca4619661	011811	PP-A1		Credit-Prepaid	(80.00)	(80.00)
020111		APPLY CHARGES		A1		Maintenance Fee	80.00	0.00
020111		APPLY PREPAYMNT		A1		Maintenance Fee	(80.00)	0.00
021111	80.00	8891	021111	PP-A1		Credit-Prepaid	(80.00)	(80.00)
021411	(80.00)	ca4619661	PA-ADJ	PP-A1		Credit-Prepaid	80.00	0.00
021411		credit to wrong account						
030111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
031511	80.00	8976	031511	A1		Maintenance Fee	(80.00)	0.00
040111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
041211	80.00	9069	041211	A1		Maintenance Fee	(80.00)	0.00
050111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
051011		EXPENSE ADJ		09		Lease Renewal	20.00	100.00
051011		lease renewal - 6/1/11						
051211	80.00	9154	051211	A1		Maintenance Fee	(80.00)	20.00
052011	20.00	9211	052011	09		Lease Renewal	(20.00)	0.00
060111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
061411	80.00	9283	061411	A1		Maintenance Fee	(80.00)	0.00
070111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
070511		EXPENSE ADJ		16		I.D. / Pool Car	7.00	87.00
070511		2011 pool pass Tenant						
070611	7.00	CA451595	070611	16		I.D. / Pool Car	(7.00)	80.00
071511	80.00	9363	071511	A1		Maintenance Fee	(80.00)	0.00
080111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
081211	80.00	9451	081211	A1		Maintenance Fee	(80.00)	0.00
090111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
091311	80.00	9538	091311	A1		Maintenance Fee	(80.00)	0.00

**FINANCIAL TRANSACTIONS - 03/19/18**

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
100111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
101311	80.00	9618	101311	A1		Maintenance Fee	(80.00)	0.00
110111		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
110211		EXPENSE ADJ		12		Violate Serv Fe	15.00	95.00
110211	Green can left out after 10:00 am on 11/1							
111511	80.00	9746	111511	A1		Maintenance Fee	(80.00)	15.00
120111		APPLY CHARGES		A1		Maintenance Fee	80.00	95.00
120511	80.00	9808	120511	A1		Maintenance Fee	(80.00)	15.00
120711		EXPENSE ADJ		12		Violate Serv Fe	15.00	30.00
120711	blue can left out on 12/7/11 after 11:00am							
010112		APPLY CHARGES		A1		Maintenance Fee	80.00	110.00
011312	80.00	9913	011312	A1		Maintenance Fee	(80.00)	30.00
011312	30.00	9916	011312	12		Violate Serv Fe	(30.00)	0.00
012712		EXPENSE ADJ		11		Service Fee	15.00	15.00
012712	picked up trash in front of unit (cigarettes)							
020112		APPLY CHARGES		A1		Maintenance Fee	80.00	95.00
021012	80.00	10013	021012	A1		Maintenance Fee	(80.00)	15.00
021412		EXPENSE ADJ		11		Service Fee	15.00	30.00
021412	blue can left out after 1pm on 2/8/12							
030112		APPLY CHARGES		A1		Maintenance Fee	80.00	110.00
031312	80.00	10105	031312	A1		Maintenance Fee	(80.00)	30.00
040112		APPLY CHARGES		A1		Maintenance Fee	80.00	110.00
041312	80.00	10207	041312	A1		Maintenance Fee	(80.00)	30.00
050112		APPLY CHARGES		A1		Maintenance Fee	80.00	110.00
051112		EXPENSE ADJ		09		Lease Renewal	20.00	130.00
051112	lease renewal expires June							
051112	80.00	10305	051112	A1		Maintenance Fee	(80.00)	50.00
051112	20.00	10229	051112	09		Lease Renewal	(20.00)	30.00
060112		APPLY CHARGES		A1		Maintenance Fee	80.00	110.00
060612		EXPENSE ADJ		16		I.D. / Pool Car	3.00	113.00
060612	2012 ID's - Tenant 2/1quest renewal							

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FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
060712	33.00	CA999331	060712	16		I.D. / Pool Car	(3.00)	80.00
060712				11		Service Fee	(30.00)	
061212	80.00	10416	061212	A1		Maintenance Fee	(80.00)	0.00
070112		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
071212	80.00	10529	071212	A1		Maintenance Fee	(80.00)	0.00
080112		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
081512	80.00	10610	081512	A1		Maintenance Fee	(80.00)	0.00
090112		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
091212	80.00	10734	091212	A1		Maintenance Fee	(80.00)	0.00
100112		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
101512	80.00	10804	101512	A1		Maintenance Fee	(80.00)	0.00
110112		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
111512	80.00	10884	111512	A1		Maintenance Fee	(80.00)	0.00
120112		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
121312	80.00	11046	121312	A1		Maintenance Fee	(80.00)	0.00
123112		EXPENSE ADJ		13		Coventry Prog.	20.00	20.00
123112		Invoice # 004921 carbon monoxide for s.i.						
010113		APPLY CHARGES		A1		Maintenance Fee	80.00	100.00
011413	20.00	11122	011413	13		Coventry Prog.	(20.00)	80.00
011413	80.00	11123	011413	A1		Maintenance Fee	(80.00)	0.00
020113		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
021213	80.00	11234	021213	A1		Maintenance Fee	(80.00)	0.00
030113		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
031413	80.00	11325	031413	A1		Maintenance Fee	(80.00)	0.00
040113		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
041213	80.00	11402	041213	A1		Maintenance Fee	(80.00)	0.00
050113		APPLY CHARGES		A1		Maintenance Fee	80.00	80.00
052113		APPLY LATE FEE		01		Late Fees	25.00	105.00



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164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

040114 green can left out till friday 3/29/14

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Coventry Square Condo. Assoc.

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FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
041014	110.00	12535	041014	A1		Maintenance Fee	(110.00)	15.00
050114		APPLY CHARGES		A1		Maintenance Fee	110.00	125.00
051414	110.00	12605	051414	A1		Maintenance Fee	(110.00)	15.00
060114		APPLY CHARGES		A1		Maintenance Fee	110.00	125.00
060214		EXPENSE ADJ		16		I.D. / Pool Car	2.00	127.00
060214		2014 ONE TIME REMOVAL						
060214	20.00	CA-65661	060214	16		I.D. / Pool Car	(2.00)	107.00
060214				12		Violate Serv Fe	(15.00)	
060214				PP-A1		Credit-Prepaid	(3.00)	
061314	110.00	12719	061314	A1		Maintenance Fee	(110.00)	(3.00)
070114		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00
070114		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
071514	110.00	12829	071514	A1		Maintenance Fee	(107.00)	(3.00)
071514				PP-A1		Credit-Prepaid	(3.00)	
080114		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00
080114		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
081314	110.00	12924	081314	A1		Maintenance Fee	(107.00)	(3.00)
081314				PP-A1		Credit-Prepaid	(3.00)	
090114		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00
090114		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
091114	110.00	13045	091114	A1		Maintenance Fee	(107.00)	(3.00)
091114				PP-A1		Credit-Prepaid	(3.00)	
100114		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00
100114		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
101514	110.00	13162	101514	A1		Maintenance Fee	(107.00)	(3.00)
101514				PP-A1		Credit-Prepaid	(3.00)	
110114		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00
110114		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
111214	110.00	13256	111214	A1		Maintenance Fee	(107.00)	(3.00)
111214				PP-A1		Credit-Prepaid	(3.00)	
120114		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00

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Coventry Square Condo. Assoc.

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FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
120114		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
121514	110.00	13356	121514	A1		Maintenance Fee	(107.00)	(3.00)
121514				PP-A1		Credit-Prepaid	(3.00)	
010115		APPLY CHARGES		A1		Maintenance Fee	110.00	107.00
010115		APPLY PREPAYMNT		A1		Maintenance Fee	(3.00)	107.00
011415	107.00	13455	011415	A1		Maintenance Fee	(107.00)	0.00
020115		APPLY CHARGES		A1		Maintenance Fee	110.00	110.00
021815		APPLY LATE FEE		01		Late Fees	25.00	135.00
030115		APPLY CHARGES		A1		Maintenance Fee	125.00	260.00
040115		APPLY CHARGES		A1		Maintenance Fee	125.00	385.00
050115		APPLY CHARGES		A1		Maintenance Fee	125.00	510.00
052015		APPLY LATE FEE		01		Late Fees	25.00	535.00
060115		APPLY CHARGES		A1		Maintenance Fee	125.00	660.00
061615		APPLY LATE FEE		01		Late Fees	25.00	685.00
062415		APPLY CHARGES		A1		Maintenance Fee	125.00	810.00
071715		APPLY LATE FEE		01		Late Fees	25.00	835.00
080115		APPLY CHARGES		A1		Maintenance Fee	125.00	960.00
081715		APPLY LATE FEE		01		Late Fees	25.00	985.00
090115		APPLY CHARGES		A1		Maintenance Fee	125.00	1110.00
100115		APPLY CHARGES		A1		Maintenance Fee	125.00	1235.00
101615		APPLY LATE FEE		01		Late Fees	25.00	1260.00
110115		APPLY CHARGES		A1		Maintenance Fee	125.00	1385.00
111715		APPLY LATE FEE		01		Late Fees	25.00	1410.00
120115		APPLY CHARGES		A1		Maintenance Fee	125.00	1535.00
121615		APPLY LATE FEE		01		Late Fees	25.00	1560.00
010116		APPLY CHARGES		A1		Maintenance Fee	125.00	1685.00

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FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
011916		APPLY LATE FEE	01			Late Fees	25.00	1710.00
020116		APPLY CHARGES	A1			Maintenance Fee	125.00	1835.00
021016		EXPENSE ADJ	05			Attorney / lien	30.00	1865.00
021016		lien filing fee						
021816		APPLY LATE FEE	01			Late Fees	25.00	1890.00
030116		APPLY CHARGES	A1			Maintenance Fee	125.00	2015.00
031616		APPLY LATE FEE	01			Late Fees	25.00	2040.00
040116		APPLY CHARGES	A1			Maintenance Fee	125.00	2165.00
041816		APPLY LATE FEE	01			Late Fees	25.00	2190.00
050116		APPLY CHARGES	A1			Maintenance Fee	125.00	2315.00
052316		APPLY LATE FEE	01			Late Fees	25.00	2340.00
060116		APPLY CHARGES	A1			Maintenance Fee	125.00	2465.00
070116		APPLY CHARGES	A1			Maintenance Fee	125.00	2590.00
072616		APPLY LATE FEE	01			Late Fees	25.00	2615.00
080116		APPLY CHARGES	A1			Maintenance Fee	125.00	2740.00
081916		APPLY LATE FEE	01			Late Fees	25.00	2765.00
090116		APPLY CHARGES	A1			Maintenance Fee	125.00	2890.00
100116		APPLY CHARGES	A1			Maintenance Fee	125.00	3015.00
110116		APPLY CHARGES	A1			Maintenance Fee	125.00	3140.00
112116		APPLY LATE FEE	01			Late Fees	25.00	3165.00
120116		APPLY CHARGES	A1			Maintenance Fee	125.00	3290.00
122216		APPLY LATE FEE	01			Late Fees	25.00	3315.00
010117		APPLY CHARGES	A1			Maintenance Fee	125.00	3440.00
012617		APPLY LATE FEE	01			Late Fees	25.00	3465.00
020117		APPLY CHARGES	A1			Maintenance Fee	125.00	3590.00
022317		APPLY LATE FEE	01			Late Fees	25.00	3615.00



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Coventry Square Condo. Assoc.

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FINANCIAL TRANSACTIONS - 03/19/18

164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

DATE	PAYMT AMT	CHECK #	DEP DT	CODE	N/A	DESCRIPTION	AMOUNT	BALANCE
030117		APPLY CHARGES	A1			Maintenance Fee	125.00	3740.00
032317		APPLY LATE FEE	01			Late Fees	25.00	3765.00
040117		APPLY CHARGES	A1			Maintenance Fee	125.00	3890.00
042517		APPLY LATE FEE	01			Late Fees	25.00	3915.00
050117		APPLY CHARGES	A1			Maintenance Fee	125.00	4040.00
052617		APPLY LATE FEE	01			Late Fees	25.00	4065.00
060117		APPLY CHARGES	A1			Maintenance Fee	125.00	4190.00
062117		APPLY LATE FEE	01			Late Fees	25.00	4215.00
070117		APPLY CHARGES	A1			Maintenance Fee	125.00	4340.00
072717		APPLY LATE FEE	01			Late Fees	25.00	4365.00
080117		APPLY CHARGES	A1			Maintenance Fee	125.00	4490.00
081817		APPLY LATE FEE	01			Late Fees	25.00	4515.00
090117		APPLY CHARGES	A1			Maintenance Fee	125.00	4640.00
092517		APPLY LATE FEE	01			Late Fees	25.00	4665.00
100117		APPLY CHARGES	A1			Maintenance Fee	125.00	4790.00
102617		APPLY LATE FEE	01			Late Fees	25.00	4815.00
110117		APPLY CHARGES	A1			Maintenance Fee	125.00	4940.00
112717		APPLY LATE FEE	01			Late Fees	25.00	4965.00
120117		APPLY CHARGES	A1			Maintenance Fee	125.00	5090.00
010118		APPLY CHARGES	A1			Maintenance Fee	125.00	5215.00
012518		APPLY LATE FEE	01			Late Fees	25.00	5240.00
020118		APPLY CHARGES	A1			Maintenance Fee	125.00	5365.00
022618		APPLY LATE FEE	01			Late Fees	25.00	5390.00
030118		APPLY CHARGES	A1			Maintenance Fee	125.00	5515.00
031418		EXPENSE ADJ	A1			Maintenance Fee	(4610.00)	905.00
031418		EXPENSE ADJ	01			Late Fees	(750.00)	155.00

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164 Downing Street  
Steven Hauptman  
Unit ID: 2164  
PREPAID BAL: 0.00

031418 property sold at sheririf's sale

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

Stuart J. Lieberman, Esq.  
LIEBERMAN & BLECHER, P.C.  
10 Jefferson Plaza, Suite 400  
Princeton, NJ 08540  
Attorneys for Creditor Coventry Square  
Condominium Association

In Re:

Avraham Manheim and Sylvia Manheim,  
Debtors

Case No.: 17-33851

Chapter: 11

Adv. No.: n/a

Hearing Date: n/a

Judge: Hon. Michael B. Kaplan, U.S.B.J.

**CERTIFICATION OF SERVICE**

1. I, Stuart J. Lieberman, Esq.:

☒ represent Coventry Square Condo. Assn. in this matter.

☐ am the secretary/paralegal for \_\_\_\_\_, who represents  
\_\_\_\_\_ in this matter.

☐ am the \_\_\_\_\_ in this case and am representing myself.

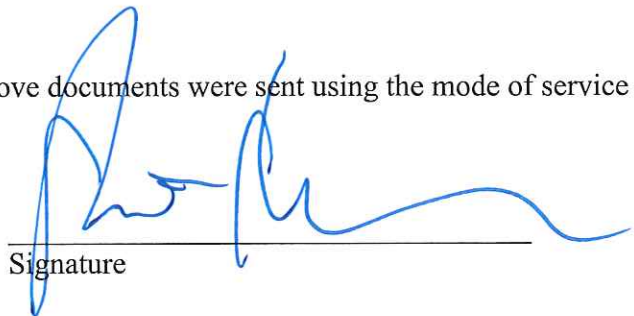
2. On April 2, 2018, I sent a copy of the following pleadings and/or documents  
to the parties listed in the chart below.

Objection of Creditor Coventry Square Condominium Association to Debtors' First Modified  
Plan of Reorganization

3. I certify under penalty of perjury that the above documents were sent using the mode of service  
indicated.

Date: April 2, 2018

Signature



Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Timothy P. Nuemann, Esq. timothy.nuemann25@gmail.com	Debtors' counsel	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>e-filing</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
U.S. Trustee USTPRRegion03.NE.ECF@usdoj.gov	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>e-filing</u> (As authorized by the Court or by rule. Cite the rule if applicable.)
Avaraham D. Manheim, and Sylvia Manheim 807 Forest Avenue Lakewood, NJ 08701-2627	Debtors	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)
		<input type="checkbox"/> Hand-delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable.)